GS.II Systemic issues are identified and remediated through the analysis of findings from information and data collected from all available sources, including monitoring, complaint investigations and hearing resolutions.

1. Baseline/Trend Data and Analysis (for reporting period July 1, 2002 through June 30, 2003)

See tables in GS.I. Four monitoring standards showed noncompliance in all of the Phase 1 SPOEs. The standards included the following:

- Application of eligibility criteria, particularly the use of Informed Clinical Opinion for children identified as eligible for services under the category of Developmental Delay
- Lack of documentation of the basis for the determination of eligibility.
- The 45-day timeline for development of an IFSP from the date of referral was not being met
- Requirements for conducting a Family Assessment were not clearly understood.

Noncompliance in all Phase 1 SPOEs indicates that these were systemic issues, and all are being addressed in current initial and follow-up monitoring as well as trainings.

Sixteen child complaints were filed in 2002-03. Ten of those had findings of noncompliance. Allegations included referral issues, timelines and transition, some of which coincide with monitoring results for that year. Child complaints increased from three in 2001-02 to sixteen in 2002-03. Most of the complaints are from the St. Louis area dealing with timelines. St. Louis had numerous start-up and staffing challenges, many of which were exacerbated by the contract situation in which no additional funds were available to deal with staffing issues. The St. Louis SPOE is part of Phase 1 and is currently being re-bid under the new RFP.

2. Targets: (for reporting period July 1, 2002 through June 30, 2003)

Systemic issues are identified and remediated.

3. Explanation of Progress or Slippage: (for reporting period July 1, 2002 through June 30, 2003)

The new RFP for Phase 1 SPOEs addresses the lack of oversight and monitoring of service coordinators and providers. The new webSPOE software in very compliance driven and will ensure compliance proactively rather than after the fact.

Due to the full implementation towards the end of the reporting year (July 1, 2002 through June 30, 2003), data provided under "Baseline/Trend Data and Analysis" will be considered baseline. The focus for the majority of 2002-03 was to reach full implementation for the redesigned First Steps program.

4. Projected Targets:

- · Systemic issues are identified and remediated.
- Additional projected targets are in the Future Activities tables.

5. & 6. Future Activities to Achieve Projected Targets/Results and Projected Timelines and Resources:

See also GS.I, GS.IV, CE.I and CBT

New Cluster/ Probe	IP Key	Activity Key	Activity Groups (5)	Future Activities to Achieve Projected Targets (5)	Projected Targets/ Evidence of Change (4)	Projected Timelines (6)	Resources (6)
GS.II	4.4	4.4.7	Development of monitoring system	Develop report formats	Report formats developed	2004-05	Comp
GS.II	4.4	4.4.8	Development of monitoring system	Develop CMS for First Steps	CMS developed for First Steps	2004-05	Comp
GS.II	4.4	4.4.9.3	Development of monitoring system	Identify data reports from system	Data reports identified	2003-04	Data, Comp
GS.II	4.4	4.4.9.4	Development of monitoring system	Identify the standards that can be monitored via the reports	Standards identified	2003-04	Comp
GS.II	4.4	4.4.9.5	Development of monitoring system	Identify the standards that require onsite visits	Standards identified	2003-04	Comp
GS.II GS.III	4.7	4.7.6	Monitoring of data reports	Monitor complaint system	Utilized in monitoring system, parents aware of and have access to rights	2003-04 Ongoing	DSE Staff
GS.II	4.7	4.7.7	Monitoring of data reports	Examine monitoring reports	All in compliance	7/2004 Ongoing	DSE Staff